

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

In re: PHARMACEUTICAL INDUSTRY)	MDL No. 1456
AVERAGE WHOLESALE PRICE)	Civil Action No. 01-12257-PBS
LITIGATION)	Judge Patti B. Saris
_____)	
THIS DOCUMENT RELATES TO:)	
<i>United States of America ex rel.</i>)	Magistrate Judge Marianne B. Bowler
<i>Ven-a-Care of the Florida Keys, Inc., v.</i>)	
<i>Abbott Laboratories, Inc.</i>)	
CIVIL ACTION NO. 06-11337-PBS)	
_____)	

UNITED STATES' UNOPPOSED MOTION TO ENLARGE TIME

The United States of America, through undersigned counsel, respectfully files this Unopposed Motion for an enlargement of time until October 12, 2007 to file its response to defendant Abbott Laboratories, Inc.'s ("Abbott's") Motion for a Preservation Order (Docket Entry 4711). In support, the United States provides the following.

1. The United States' response is due September 27, 2007. Additional time is needed due to undersigned counsel's previously scheduled matters, including days away from the district on work-related travel, as well as other case deadlines that were previously scheduled.
2. Counsel for the United States contacted counsel for defendant Abbott who indicated that he would not oppose this request for additional time.

For the above reasons, the United States respectfully requests that this motion be granted.

Respectfully submitted,

MICHAEL J. SULLIVAN
UNITED STATES ATTORNEY

George B. Henderson, II
Assistant U.S. Attorney
John Joseph Moakley U.S. Courthouse
Suite 9200, 1 Courthouse Way
Boston, MA 02210
Phone: (617) 748-3398
Fax: (617) 748-3272

R. ALEXANDER ACOSTA
UNITED STATES ATTORNEY
SOUTHERN DISTRICT OF FLORIDA

/s/ Ana Maria Martinez
Mark A. Levine
Ana Maria Martinez
Ann St.Peter-Griffith
Special Attorneys for
the Attorney General
99 N.E. 4th Street, 3rd Floor
Miami, FL 33132
Phone: (305) 961-9003
Fax: (305) 536-4101

PETER D. KEISLER
ASSISTANT ATTORNEY GENERAL

/s/ Justin Draycott
Joyce R. Branda
Daniel R. Anderson
Renée Brooker
Justin Draycott
Gejaa T. Gobena
Rebecca Ford
Civil Division
Commercial Litigation Branch
P. O. Box 261
Ben Franklin Station
Washington, D.C. 20044
Phone: (202) 307-1088
Fax: (202) 307-3852

Dated: September 26, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have this day caused an electronic copy of the above UNITED STATES' UNOPPOSED MOTION TO ENLARGE TIME to be served on all counsel of record via electronic service by sending a copy to LexisNexis File & Serve for posting and notification to all parties.

Date: September 26, 2007

/s/ Justin Draycott
Justin Draycott